

1 **I. INTRODUCTION**

2 Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Sonos, Inc. (“Sonos”) hereby
 3 requests to file under seal the entirety of Exhibit 1 to the Declaration of Geoffrey Moss in support
 4 of Sonos, Inc.’s Motion for Leave to Amend Infringement Contentions Pursuant to Patent
 5 L.R.3-6.

DOCUMENT	PORTIONS TO BE SEAL	DESIGNATING PARTY
Exhibit 1 to the Declaration of Geoffrey Moss in support of Sonos, Inc.’s Motion for Leave to Amend Infringement Contentions Pursuant to Patent L.R. 3-6	Entire document	Google

11 **II. LEGAL STANDARD**

13 Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document,
 14 or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection
 15 under the law” (*i.e.*, is “sealable”). *See* Civil L.R. 79-5(b). The sealing request must also “be
 16 narrowly tailored to seek sealing only of sealable material.” *Id.*

17 **III. GOOGLE’S CONFIDENTIAL INFORMATION**

18 Sonos seeks to seal the document because Google, LLC (“Google”) has designated the
 19 information Confidential and/or Highly Confidential-Attorneys’ Eyes Only and/or Highly
 20 Confidential-Source Code pursuant to the Protective Order (Dkt. 92). *See* Declaration of Cole B.
 21 Richter in Support of Administrative Motion filed concurrently herewith, ¶ 2. Sonos takes no
 22 position on the merits of sealing Google’s designated material, and expects Google to file one or
 23 more declarations in accordance with the Local Rules.

24 **IV. CONCLUSION**

25 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the
 26 above-listed document accompany this Administrative Motion. For the foregoing reasons, Sonos
 27 respectfully requests that the Court grant Sonos’s Administrative Motion.

1 Dated: February 7, 2022

2 By: /s/ Cole B. Richter

3 CLEMENT SETH ROBERTS
4 ALYSSA CARIDIS
EVAN D. BREWER

5 ORRICK, HERRINGTON & SUTCLIFFE LLP

6 GEORGE I. LEE
7 SEAN M. SULLIVAN
COLE B. RICHTER
RORY P. SHEA
J. DAN SMITH

8
9 LEE SULLIVAN SHEA & SMITH LLP

10 *Attorneys for Defendant Sonos, Inc.*

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28